REMARKS/ARGUMENTS

I. Status of Claims

Claims 1-10 are pending of which claims 1 and 6 are independent.

II. Rejections under 35 U.S.C. §103 (a)

Claims 1-10 are rejected under 35 U.S.C. 103(a) as being unpatentable over Ahn (KR Pub. No. 2002-058347 – hereinafter Ahn) in view of Lee (KR Pub. No. 2001-019998 – hereinafter Lee), further in view of Pyo (KR Pub. No. 2002-011547 – hereinafter Pyo) and Marjamaki et al. (U.S. Pub. No. 2003-0139141 A1 – hereinafter Marjamaki), further in view of Wallentin (U.S. Pub. No. 2006-0234706 A1 – hereinafter Wallentin), and Kim (KR Pub. No. 2001-045784 – hereinafter Kim). Applicant respectfully traverse the rejection.

Claim 1 recites a method for updating identifier (ID) information of a Node-B, and resetting a UMTS radio manager (URM) system using the updated ID information of the Node-B in the URM system which manages the Node-B and a predetermined number of radio network controllers (RNCs) each associated with a source RNC, said method comprising:

> "a) using the URM system to create a processor loading data (PLD) of the Node-B that can be changed, and transmitting the created PLD in a form of an extension specification file (ESF) to the Node-B and the RNCs each of which is associated with the source RNC requiring the created PLD, the created PLD being created by correcting data that is different from a previously-stored PLD;

> b) operating the Node-B and the RNCs having received the created PLD in the form of ESF to update a previously stored old PLD according to the received PLD in the form of ESF; and

> c) resetting the Node-B and the RNCs upon receipt of the updated PLD;

wherein the ESF stores data to be updated in relation to received hardware format information and data associated with the data that is different between the old PLD and the updated PLD."

In the "Response to Arguments" section, the Examiner appears to contend that Pyo teaches the ESF as claimed. Applicants disagree with the Examiner's assessment. Specifically, Pyo merely discloses that a UMTS radio manager creates an ESF having sector increment/decrement information and transmits the ESF to an RNC. In addition, according to Pyo, the RNC must then transmit the received ESF to a Node B.

Hence, the ESF, as disclosed in Pyo, must not only be transmitted from a UMTS radio manger to an RNC, but also be transmitted from the RNC to a Node B. On the other hand, claim 1 recites that a created PLD in a form of an ESF be transmitted to *the Node-B and the RNCs* each of which is associated with the source RNC requiring the created PLD. Therefore, unlike Pyo, which requires that the ESF be transmitted to RNC and then be transmitted from the RNC to the Node B, according to claim 1, the ESF is transmitted to *the RNCs and the Node-B*, and there is no need that the received PLD (in the form of the ESF) be further transmitted from an RNC to a Node B after the RNC receives the created PLD.

Consequently, the ESF of Pyo is disclosed as being used in a context different from the context associated with the claimed ESF as recited in claim 1. Accordingly, Applicant respectfully submits that Pyo does not teach or suggest the ESF as recited in claim 1. Since the Examiner solely relies on Pyo as teaching the ESF as claimed, Applicant therefore respectfully submits that claim 1 should be allowable over Ahn, Lee, Marjamaki, Wallentin, Kim and Pyo. Accordingly, the rejection of claim 1 should be withdrawn.

Claim 6 contains similar recitation to claim 1 concerning the ESF and the context with which the ESF is associated, particularly with respect to that the ESF is transmitted to *the RNCs and the Node-B*, and there is no need that the created PLD be further transmitted from an RNC to a Node B after the RNC receives the created PLD.

Accordingly, claim 6 should also be allowable over Ahn, Lee, Marjamaki, Wallentin, Kim and Pyo. The rejection of claim 6 should therefore be withdrawn.

The rejection of claims 2-5 and 7-10 should be withdrawn by virtue of their dependency from allowable claims 1 and 6.

III. Conclusion

In view of the above, it is believed that this application is in condition for allowance and notice to this effect is respectfully requested. Should the Examiner have any questions, the Examiner is invited to contact the undersigned at the telephone number indicated below.

Should **any/additional** fees be required, the Director is hereby authorized to charge the fees to Deposit Account No. 18-2220.

Respectfully submitted,
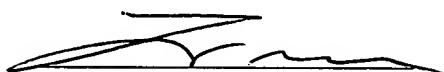
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Dated: ____November 19, 2008_____